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6 Attorneys for Defendants

GOLDSMITH & HULL, APC and

7 WILLIAM I. GOLDSMITH

8 UNITED STATES DISTRICT COURT
9
10 CENTRAL DISTRICT OF CALIFORNIA

11 POVILAS KARCAUSKAS, on behalf
12 of himself and all others similarly
situated,

13 Plaintiff,

14 vs.

15 REGRESO FINANCIAL SERVICES
16 LLC; GOLDSMITH & HULL, APC;
17 WILLIAM I. GOLDSMITH; and
DOES 1 to 10;

18 Defendants.

CASE NO. 2:15-cv-09225-FMO-RAOx

**DECLARATION OF STEPHEN H.
TURNER FILED IN SUPPORT OF
DEFENDANTS GOLDSMITH &
HULL, APC AND WILLIAM I.
GOLDSMITH'S EX PARTE
APPLICATION FOR AN
ADDITIONAL WEEK TO
PREPARE THEIR PORTIONS IN
TWO JOINT STATEMENTS
WHICH WILL BE SUBMITTED BY
PLAINTIFF TO COMPEL
FURTHER DISCOVERY
RESPONSES**

Plaintiff Opposes This Application

DATE:

TIME:

COURTROOM: 22 (Spring Street)

Trial Date: March 21, 2017

[Hon. Fernando M. Olguin]

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1 I, Stephen H. Turner, declare that I am a partner in the law firm of Lewis
 2 Brisbois Bisgaard & Smith LLP. I am familiar with the facts set forth in this
 3 declaration by my own knowledge and if called upon I could and would
 4 competently testify thereto.

5 1. On September 9, 2016, I sent Plaintiff's counsel, Robert Stempler, an
 6 email advising him that I was unable to respond to certain discover issues within the
 7 time I represented I would respond because I was dealing with a medical issue. I
 8 advised that I would respond this week.

9 2. Although I would have preferred to keep private the medical and
 10 personal issues with which I am currently dealing because it is imperative that
 11 William I. Goldsmith and Goldsmith & Hull ("Defendants") have the opportunity to
 12 fully respond to Plaintiff's two joint stipulations, I am disclosing information which
 13 is pertinent to my clients' Ex Parte Application. I am purposely limiting the
 14 information as much as possible.

15 3. Nine years ago I was diagnosed with a blood disorder which requires
 16 constant monitoring and daily medication. At that time I was hospitalized for a
 17 week.

18 4. Approximately a month ago, one of the factors in my blood which is
 19 monitored, unexpectedly and inexplicably moved from a "safe zone" to an unsafe
 20 level. This has required additional consultation with my doctors, additional medical
 21 procedures and modification of my medicine. For example on September 16, 2016,
 22 the day Mr. Stempler sent the two joint statements and appendix to my partner Ms.
 23 Nefulda and to me, I had a medical procedure. Then on September 14, 2016, I had a
 24 consultation. I will have to have an additional procedure on September 20, 2016,
 25 the day when my clients' portions of the statements are currently due.

26 5. Despite the efforts of my doctors and the modification of my medicine,
 27 the factor remains at an unsafe level. It has, however, improved. It is hoped, and
 28 thought likely, that the factor will return to a safe level next week. That will be a

